FINAL REPORT

Study Title

Test for Chemical Induction of Chromosome Aberrations in Cultured Chinese Hamster Ovary (CHO) Cells With and Without Metabolic Activation

Test Article

Ethylenediamine dinitrate (EDDN)

Authors

Jian Song, Ph.D. Paul E. Kirby, Ph.D.

Performing Laboratory

SITEK Research Laboratories 15235 Shady Grove Road, Suite 303 Rockville, Maryland 20850

Laboratory Project I.D.

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Sponsor's Study Coordinator

Gunda Reddy, Ph.D., DABT

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STUDY DIRECTOR'S COMPLIANCE STATEMENT

Study No.: 1003-3110

The Sponsor's Test Article I.D.: Ethylenediamine dinitrate (EDDN)

The protocol (Appendix III) for this study was designed to meet or exceed the US EPA, OECD, and ICH Guidelines specified in the following documents(1-3):

United States Environmental Protection Agency, Title 40 Code of Federal Regulations Part 798, Health Effects Testing Guidelines, Subpart F Section 798.5375, *In Vitro* Mammalian Cytogenetics. Revised July 1, 2002.

OECD Guideline for the Testing of Chemicals, No. 473. *In Vitro* Mammalian Chromosome Aberration Test. Adopted July 21, 1997.

International Conference on Harmonisation of Technical Requirements for Registration of Pharmaceuticals for Human Use. ICH Harmonised Tripartite Guideline S2A. <u>Guidance on Specific Aspects of Regulatory Genotoxicity Tests for Pharmaceuticals</u>. Federal Register 61 (80):18198-18202, 1996.

The study described in this report was conducted in compliance with the following Good Laboratory Practice standards with the exception that the dosing solution analysis was not conducted:

United States Environmental Protection Agency, Title 40 Code of Federal Regulations Parts 160 and 792, Revised July 1, 2005.

United States Food and Drug Administration, Title 21 Code of Federal Regulations Part 58, Revised April 1, 2005.

Japanese Ministry of Agriculture, Forestry and Fisheries, 11 NohSan, Notification No. 6283, October 1, 1999.

Japanese Ministry of Health and Welfare, Ordinance No. 21, April 1, 1997.

Japanese Ministry of International Trade and Industry, Notification No. 85, Basic Industries Bureau, March 31, 1984.

Organization for Economic Cooperation and Development, The OECD Principles of Good Laboratory Practice, Environment Monograph No. 45 [ENV/MC/CHEM(98)17], Paris 1998.

The strength and stability of the test article, dosing solutions and controls, under the experimental conditions, were not determined.

Signature: Paul E. Kirby,, Ph.D.

Study Director

 $^{^{\}mathrm{1}}$ Dr. Jian Song was the Study Director for the in-life phase of this study and was the author of the draft report. He was not in the employ of SITEK Research Laboratories when this final report was prepared, therefore, Dr. Kirby has replaced him as Study Director.

QUALITY ASSURANCE UNIT'S STATEMENT

Study No.: <u>1003-3110</u>

Sponsor's Test Article I.D.: Ethylenediamine dinitrate (EDDN)

The performance of this study was audited for adherence to the Good Laboratory Practice regulations for nonclinical laboratory studies by the Quality Assurance Unit of SITEK Research Laboratories. In this context, the facilities, equipment, personnel, methods, practices, controls, original data and reports have been inspected as per SITEK's Quality Assurance Unit's Standard Operating-Procedures. The information contained within this report accurately reflects the raw data generated from this study.

Protocol Review Date: 8-5-2009

The following phases were inspected for this study:

Inspection		Date Findings Reported to	Date Findings Reported to
Date	Phases Inspected	Study Director	Management
08-27-09	Preparation of the Slides	08-31-09	09-01-09
10-01-09	Workbook Audit	10-01-09	10-07-09
10-06-09	Draft Report Audit	10-07-09	10-07-09
02-25-10	Final Report Audit	02-25-10	02-25-10

STUDY DIRECTOR SIGNATURE PAGE

This study was performed under the supervision of Jian Song, Ph.D., Study Director, for in vitro cytogenetic assays at SITEK Research Laboratories, 15235 Shady Grove Road, Suite 303, Rockville, Maryland 20850. Expert scoring of slides was done offsite by two SITEK part time employees.

The Draft Report for this study was written by Dr. Song and released on October 8, 2009. The Final Report was prepared by Dr. Paul E. Kirby² and released on February 25, 2010.

Paul E. Kirby, Ph.D.

Study Director

 $^{^{\}rm 2}$ Dr. Song was no longer in the employ of SITEK Research Laboratories when the final report was prepared, therefore, Dr. Kirby has replaced him as Study Director.

ABSTRACT

The results of Chromosome Aberration Assay in cultured Chinese Hamster Ovary (CHO) cells suggest that the test article, Ethylenediamine dinitrate (EDDN, Lot number: ABY08L031S010, 99.5% pure), does not exhibit clastogenic potential.

The test article, EDDN, was evaluated with and without exogenous metabolic activation for its potential to induce chromosome aberrations in CHO cells. The test article was prepared and diluted with water. In order to assess the toxicity of the test article, a Range Finding Test was performed. Based on the solubility, the test article was evaluated at concentrations of 0.5, 5, 10.0, 50.0, 100.0, 500.0, 1000.0 and 5000.0 μ g/mL both with and without metabolic activation. Water was included in both systems as the solvent control.

In the non-activated system, duplicate cultures at each concentration level were treated for 3 hours in modified McCoy's 5A medium containing 10% fetal bovine serum. In the activated system, duplicate cultures at each concentration level were treated for 3 hours in serum-free medium containing phenobarbital/ β -naphthoflavone-induced rat liver S-9 fraction. The cells were harvested approximately 18 hours after the initiation of treatment (1.5 × normal cell cycle) in both systems, with 0.1 μ g/mL Colcemid[®] present during the final 2 hours of incubation. Toxicity was determined by the reduction in relative cell growth (RCG) and/or relative mitotic index (RMI) in the treated cells, as compared to the cells treated with the solvent control. Significant cytotoxicity was observed at 5000.0 μ g/mL both without and with the metabolic activation.

Based on the results of the Range Finding Test, the Definitive Chromosome Aberration Assay was performed using test article concentrations of 500, 1000, 2000, 3000, 4000, and 5000 $\mu g/mL$ both without and with metabolic activation. Concurrent solvent and positive controls were also included. Duplicate cultures were treated at each concentration for 3 hours. The harvest time was 18 hours (1.5 \times normal cell cycle) after the initiation of treatment in both systems with 0.1 $\mu g/mL$ Colcemid present during the final 2 hours. Mitomycin-C (MMC), at 0.4 and 0.8 $\mu g/mL$ and Cyclophosphamide (CP), at 7.5 and 12.5 $\mu g/mL$, were used as the positive controls in the non-activated and activated systems, respectively.

Based on the cytotoxicity data, chromosome aberrations were scored from the cells treated with the concentrations of 1000, 2000 and 3000 μ g/mL without activation and 3000, 4000 and 5000 μ g/mL with activation. The corresponding solvent control and one concentration each of the positive controls (MMC at 0.8 μ g/mL and CP at 12.5 μ g/mL) were also scored. Two hundred metaphases were scored from each concentration and the controls. Statistical analysis using the Chi-square test was performed. Toxicity was measured by determining the RCG and/or RMI. The percentage of polyploid and endoreduplicated cells was also determined at each concentration. Both the solvent control and positive controls in the Definitive Chromosome Aberration Assay fulfilled the requirements of a valid test. The results from the Definitive Assay were negative both with and without activation.

A Confirmatory Chromosome Aberration Assay was performed without activation only, since the results from the Definitive Assay were negative in the non-activated system. The concentrations tested were 500, 1000, 2000, 3000, 4000 and 5000 μ g/mL. The treatment time was 18 hours. The harvest time was 18 hours after the initiation of treatment (1.5 × normal cell cycle). The solvent control and positive control (MMC at 0.2 and 0.4 μ g/mL) were also included concurrently. Chromosome aberrations were scored from the cells treated at concentrations of 500, 1000 and 2000 μ g/mL based on the cytotoxicity data. The corresponding solvent control and one concentration of the positive controls (MMC at 0.4 μ g/mL) were also scored. Both the solvent and positive controls in the Confirmatory Assay fulfilled the requirements of a valid test. The results from the Confirmatory Assay were negative without activation.

The results from both the Definitive and the Confirmatory Chromosome Aberration Assays indicate that the test article, EDDN, did not induce a statistically significant increase in the percentage of cells with aberrations both with and without metabolic activation compared to the solvent controls, at the concentrations tested. Although the strength and stability of the test article, dosing solutions, under the experimental conditions, were not determined, the highest doses in both the Definitive and Confirmatory assays were found toxic to the test system which met the requirement of OECD Test Guideline 473. Therefore, under the conditions of this test and according to the criteria defined in the OECD test, EDDN, was determined to be negative (not clastogenic) both with and without metabolic activation in the CHO Chromosome Aberration Assay.

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INTRODUCTION

The experimental part of this study was conducted by Jian Song, Ph.D., Melkie Lulie, M.S., Shashi Sharma, B.S., Weiyu Xie, M.D. and Hussain S. Shaffi, B.S., from August 12, 2009 to September 19, 2009 at SITEK Research Laboratories. The experimental procedures used to perform this study are described by H.J. Evans (4).

The *in vitro* chromosome aberration test is designed to identify agents that cause structural chromosome aberrations in cultured mammalian cells. Structural aberrations may be of two types, chromosome or chromatid. With the majority of chemical mutagens, induced aberrations are of the chromatid type, but chromosome-type aberrations also occur. Chromosome mutations and related events are the cause of many human genetic diseases and there is substantial evidence that chromosome mutations and related events causing alterations in oncogenes and tumor suppressor genes of somatic cells are involved in cancer induction in human and experimental animals.

The purpose of this study was to evaluate the test article, EDDN, for its potential to induce genetic damage as manifested by the induction of chromosome aberrations in cultured Chinese hamster ovary (CHO) cells. CHO cells have been used extensively in the Chromosome Aberration Assay, and have been demonstrated to be effective in detecting the clastogenic activity of chemicals from a wide range of chemical classes (4-6).

MATERIALS

TEST ARTICLE

1. Name: Ethylenediamine dinitrate (EDDN)

2. CAS No.: 20829-66-7

3. Provided by: USA RDECOM, AMSRD-MSF

Environmental Acquisition & Logistics Sustaining

Program

Aberdeen Proving Ground, MD 21010

4. Batch/Lot No.: <u>ABY08L031S010</u>

5. Physical Description: Liquid(500mg/mL in deionized, distilled water)

6. Shipping Conditions: Refrigerated (1-5 °C)

7. Date Received at SITEK: August 5, 2009
8. Storage Conditions: Refrigerated (1-5 °C)

9. Purity: 99.5%

10. Expiration Date: Not Available

The Certificate of Analysis is not available but the sponsor's data indicated the purity of the test article is 99.5%.

CONTROL ARTICLES

Positive Controls

Mitomycin-C (MMC), which induces chromosome aberrations in the absence of metabolic activation, was used at 0.4 and 0.8 μ g/mL for the Definitive Chromosome Aberration Assay and 0.2 and 0.4 μ g/mL for the Confirmatory Chromosome Aberration Assay, in the non-activated system. Information on the MMC used in this study is provided below:

1. Source: <u>Sigma Chemical Company</u>

CAS No.: 50-07-7
 Lot No.: 117K1188
 Storage Conditions: 1-5°C

5. Expiration Date: December 9, 2013

Cyclophosphamide (CP), which induces chromosome aberrations in the presence of metabolic activation, was used at 7.5 and 12.5 μ g/mL for Definitive Chromosome Aberration Assay in the activated system. Information on the CP used in this study is provided below:

1. Source: Sigma Chemical Company

2. CAS No.: 6055-19-2 3. Lot No.: 075K1661 4. Storage Conditions: <u>1-5°C</u>

5. Expiration Date: May 2, 2011

MMC and CP were dissolved in deionized, distilled water (ddH₂O) to prepare the stock solutions. MMC was diluted to 80 μ g/mL and CP was diluted to 1.25 and 1.5 mg/mL. All stock solutions were dispensed in small aliquots and stored at -10 to -20°C. One vial of each was thawed just prior to treatment and used in treating the cells. For the Definitive Chromosome Aberration Assay, 25 μ L and 50 μ L of 80 μ g/mL MMC were added to 5 mL of medium to obtain the final concentrations of 0.4 and 0.8 μ g/mL, respectively. 25 μ L of 1.5 mg/mL and 50 μ L of 1.25 mg/mL of CP stock solutions were added to 5 mL of medium to give final concentrations of 7.5 and 12.5 μ g/mL, respectively. For the Confirmatory Chromosome Aberration assay, 12.5 μ L and 25 μ L of 80 μ g/mL MMC was added to 5 mL of medium to obtain the final concentrations of 0.2 and 0.4 μ g/mL, respectively.

The stability of MMC and CP, under the experimental conditions, was not determined by SITEK Research Laboratories. However, both substances were used before their expiration dates. Certificates of Analysis and their stability information can be obtained from Sigma – Aldrich.

Solvent Controls

The test article dosing solutions were prepared in ddH₂O. Therefore, ddH₂O was used as the solvent control for the test article. Information on the DD water is provided below:

1. Source: <u>SITEK</u>
2. Lot No.: 108

3. Storage Conditions: Room Temperature
4. Expiration Date: January 30, 2010

INDICATOR CELLS

The clone CHO-W-B1 of the CHO cell line, used in this study, originated at Litton Bionetics and was obtained by SITEK through the Environmental Health Research and Testing Laboratories, Lexington, Kentucky, in 1988. The doubling time of this cell line is approximately 12 hours, and its modal chromosome number is 21. The karyotype analysis of the cell line is periodically performed and documented at SITEK Research Laboratories.

CULTURE MEDIUM

The McCoy's 5A medium used in this study was obtained from Gibco-BRL. Information on the medium used in this study is provided below:

1. Source: Gibco BRL 2. Lot No.: 617932

1-<u>5°C</u> 3. Storage Conditions:

4. Expiration Date: April, 2010 (Lot: 617932)

The fetal bovine serum was obtained from Gibco BRL. It was heat inactivated prior to use in this study. The antibiotics, (penicillin and streptomycin) and the supplement, (L-glutamine), used in this study were also obtained from Gibco-BRL. The lot numbers were recorded in the study workbook.

METABOLIC ACTIVATION SYSTEM

The metabolic activation mixture was prepared by SITEK Research Laboratories and it consisted of phenobarbital-5,6-Benzoflavone (phenobarbital/\(\beta\)-naphthoflavone) -induced rat liver homogenate (S-9 fraction) and the cofactor pool (7). Prior to use in the assay, the S-9 was evaluated for its potential to induce an acceptable level of aberrations in Chinese hamster ovary cells with CP (7.5 µg/mL and 12.5 µg/mL). Immediately prior to use, the S-9 was thawed at room temperature and mixed with the cofactor pool to form the metabolic activation mixture, which consisted of 4mM NADP, 5mM glucose-6-phosphate, 30mM KCl, 10mM MgCl₂, 50mM sodium phosphate (pH 7.4) and 100 μL/mL of S-9 fraction (10%). This mixture was diluted 1:4 by volume with serum-free medium before treating the cultures.

The source, lot numbers, protein content, inducing agent, storage condition and expiration date are listed below:

AP Sciences, Inc., Columbia, MD 21045 Source:

Phenobarbital/5,6-Benzoflavone Inducing Agent:

S-9 Lot No.: 01102-2001 Protein Content: 38.5 mg/mL

<-70 °C Storage Conditions:

Expiration Date: June 19, 2011

Detailed information about the S-9 batch used in the Assay is provided in Appendix IV.

EXPERIMENTAL PROCEDURES

DOCUMENTATION

The materials, experimental procedures used in the performance of the study, experimental results and methods used in the evaluation of the results were documented in the study workbook.

TEST SYSTEM IDENTIFICATION

All of the test cultures were labeled using an indelible ink pen with the SITEK study number, control or test article concentration (used for treatment), the activation system followed by a code number (used for slide labeling) for the concentration tested, A or B to designate tubes receiving the same treatment (two replicate cultures) and the date of harvest. The slides were labeled with the SITEK study number, code number for the concentration tested, followed by A or B for two replicate cultures, and the date in which the slides were prepared.

SOLUBILITY TEST

The test article is liquid and the concentration is 500 mg/mL in deionized, distilled water. The sponsor specified water as the solvent of choice, therefore, a solubility test was not performed. $50 \mu \text{L}$ of test article at 500 mg/mL was added to 5 mL of complete medium to determine the solubility of the test article in the cell culture medium.

DETERMINATION OF pH

To determine the pH of the test article, $50~\mu L$ of test article at 500~mg/mL in water was added to 5.0~mL of complete medium, resulting in a final test article concentration of $5000~\mu g/mL$ in medium. If the test article causes a change in the color of the medium, indicating a change in pH then the pH will be measured. It may be necessary to adjust the pH of the treatment medium prior to adding it to the cultures (8).

PREPARATION OF TEST CULTURES

Stock cultures, growing in T-75 cm² tissue culture flasks in antibiotic-free medium and showing approximately 70-95% confluency, were harvested and used to prepare the test cultures. The culture medium from the T-75 cm² flasks was discarded, and the cells were washed with Ca⁺⁺- and Mg⁺⁺-free phosphate buffered saline (PBS). Cells were then dissociated by incubation at 37 \pm 1°C with 0.05% trypsin. The cells were resuspended in complete culture medium containing 10% HIFBS, 2 mM L-glutamine, 50 units/mL of penicillin and 50 μ g/mL of streptomycin. The cell suspensions were pooled, and an aliquot of the cell suspension was diluted to the appropriate

concentration and counted using a cell counter. Based on the cell counts, a separate cell suspension with $1x10^5$ cells/mL was prepared in complete medium. Five (5.0) mL of this suspension was seeded in each T-25 cm² tissue culture flask to give $5x10^5$ cells per flask. These cultures were used in the Range Finding Test and the Chromosome Aberration Assay. The culture flasks were incubated at 37° C, 5% CO₂ for approximately 20-24 hours prior to treatment.

PREPARATION OF METABOLIC ACTIVATION SYSTEM

The metabolic activation mixture consisted of phenobarbital/ β -naphthoflavone induced rat liver homogenate (S-9 fraction) and the cofactor pool. The S-9 fraction was stored at or below -70°C in small aliquots. The S-9 was validated for acceptable levels of protein content and metabolic activity. Immediately prior to use, the S-9 was thawed at room temperature and mixed with the cofactor pool to form the metabolic activation mixture which consisted of 4mM NADP, 5mM glucose-6-phosphate, 30mM KCl, 10mM MgCl₂, 50mM sodium phosphate (pH 7.4) and 100 μ L/mL of S-9 fraction. This mixture was diluted 1:4 by volume with serum-free medium and used in refeeding the cultures.

PREPARATION OF TEST ARTICLE DOSING SOLUTIONS

The test article dosing solutions were prepared just prior to treatment. The test article was 5000 μ g/mL liquid and used as the highest concentration for the Range Finding Test, the Definitive and the Confirmatory Assays. The remaining dosing solutions were prepared by subsequent dilutions.

RANGE FINDING TEST

In order to determine the toxicity of the test article, a Range Finding Test was performed.

Test cultures seeded approximately 24 hours earlier were used in the Range Finding Test. Two replicate cultures were used at each concentration level in both systems. Based on the solubility of the test article, the Range Finding Test was conducted at concentrations ranging from 0.5 to 5000.0 μ g/mL. The cytotoxicity of the test article was assessed by determining the Relative Cell Growth (RCG) and /or the Relative Mitotic Index (RMI) of the treated cells.

In the non-activated and activated systems, the culture medium was removed from the flasks and 5.0 mL of fresh, complete medium or 5.0 mL of serum-free medium with the S-9 activation mixture were added to each flask, respectively. The cells were exposed to the test article for 3 hours. The medium was then removed, and the cells were rinsed with DPBS, refed with 5.0 mL of complete medium and incubated for an additional 15 hours, with 0.1 μ g/mL Colcemid present during the final 2 hours.

All of the cultures were harvested 18 hours after the initiation of treatment (1.5 x normal cell cycle time). The medium was transferred in labeled centrifuge tubes, and the monolayer of cells was washed with PBS, dissociated with 0.05% trypsin and resuspended in the collected medium. An aliquot of this cell suspension was counted using an electronic cell counter. The number of cells per flask was calculated for each concentration, and the Relative Cell Growth (RCG) was calculated using an Excel 2003 spreadsheet program with the following formula:

RCG = No. Cells in Test Flask X 100

The remaining cell suspension was processed to determine the Relative Mitotic Index (RMI) as described below.

The cells were collected by centrifugation (800 rpm), swelled in hypotonic KCl (0.075M) and fixed in methanol: glacial acetic acid (3:1) fixative. The fixed cells were stored at 1-5°C. The cells were then collected again by centrifugation, resuspended in a small volume of fresh fixative and dropped on microslides. The slides were air dried, stained in 5% Giemsa stain and mounted in Cytoseal using #1 cover glasses. The coded slides were scored for Mitotic Index (MI). A total of 1000 cells were scored from each concentration (500 from each duplicate flask), and the number of dividing cells were recorded. The MI for each concentration was calculated using an Excel 2007 spreadsheet program with the following formula:

MI = No. of Dividing Cells from 1000 Cells

RMI = <u>Test Concentration MI</u> X 100 Solvent Control MI

The cytotoxicity was evaluated on the basis of the reduction in the RCG and/or RMI. If possible, a concentration causing approximately 50% reduction in RCG and/or RMI was selected as the highest test concentration for the Chromosome Aberration Assay. In addition, three or more lower concentrations were included in the Assay. If no cytotoxicity was observed at the maximum concentration tested, the Chromosome Aberration Assay was performed at four decreasing concentrations starting with the maximum soluble concentration or one or two concentrations with precipitate.

DEFINITIVE CHROMOSOME ABERRATION ASSAY

Based on the results of the Range Finding Test, the Definitive Chromosome Aberration Assay was performed. The Definitive Chromosome Aberration Assay was conducted with a single harvest at 1.5 x normal cell cycle time.

The test cultures were prepared as described earlier. Two replicate cultures, seeded with 1x

 10^5 cells/mL each approximately 20-24 hours earlier, were treated at each concentration level in the non-activated and activated systems. The cells were treated at concentrations of 500, 1000, 2000, 3000, 4000 and 5000 µg/mL both without and with metabolic activation based on the Range Finding Test data. Mitomycin-C (MMC), at 0.4 and 0.8 µg/mL and Cyclophosphamide (CP), at 7.5 and 12.5 µg/mL, were used as the positive controls in the non-activated and activated systems, respectively.

In the non-activated and activated systems, the culture medium was removed from the flasks and 5.0 mL of fresh, complete medium or 5.0 mL of serum-free medium with the S-9 activation mixture was added to each flask, respectively. The cells were exposed to the test article for 3 hours. The medium was then removed, and the cells were rinsed with DPBS, refed with 5.0 mL of complete medium, incubated for an additional 15 hours, with 0.1 μ g/mL Colcemid present during the final two hours, and harvested 18 hours after the initiation of the treatment (1.5 x normal cell cycle time).

The cells were processed to determine the RCG and RMI as described in the Range Finding Test.

Parallel toxicity was assessed by a reduction in the RCG and/or RMI. The slides for the RMI were also used for the determination of chromosome aberrations.

Based on the RCG and/or RMI results, chromosome aberrations were scored from the cells treated with the concentrations of 1000, 2000 and 3000 μ g/mL without activation and 3000, 4000 and 5000 μ g/mL with activation. The untreated, corresponding solvent control and one concentration each of the positive controls (MMC at 0.8 μ g/mL and CP at 12.5 μ g/mL) were also scored. Two hundred metaphases were scored from each concentration and the controls. Statistical analysis was performed using the Chi-square test. Toxicity was measured by determining the RCG and RMI. In addition, the percentage of polyploid and endoreduplicated cells was also determined at each concentration.

The types of chromosome aberrations scored and the corresponding abbreviations used are given below (9):

1. Chromatid-type Aberrations

Simple:

- tg Chromatid gap an achromatic region occurring along the length of a chromatid in which there is no misalignment.
- tb Chromatid break a discontinuity occurring along the length of either of the two chromatids in which there is a misalignment.
- isb Isochromatid break a discontinuity occurring in both the chromatids at the same locus showing complete rejoining or sister chrom-

atid union at both the broken ends or incomplete rejoining, i.e., only at one of the two broken ends.

Complex:

- qr Quadriradial chromatid interchanges between chromosomes leading to four-armed configurations. This could be asymmetrical with formation of a dicentric and an acentric chromatid, if union is complete, or symmetrical where there is no formation of a dicentric and an acentric chromatid.
- tr Triradial isochromatid-chromatid exchanges resulting in threearmed configurations and sometimes fragments. The latter should not be scored as an independent aberration. The triradial could be monocentric or dicentric.
- Interstitial deletion intra-arm intra-changes resulting in deletion of small fragments which, however, stay in association with the parent chromatid.
- ci Chromatid intrachange exchanges occurring between arms of the same chromosome resulting in asymmetrical (rings) or symmetrical configurations.
- cr Complex interchanges multiarmed configurations resulting from breakage and reunion of two or more chromosomes.

2. Chromosome-type Aberrations

Simple:

- sg Chromosome gap an achromatic region occurring in both chromatids of the chromosome at the same locus with no misalignment.
- sb Chromosome break a discontinuity at the same locus in both chromatids, giving one acentric fragment which may be misaligned and a shortened monocentric chromosome, and where there is no sister chromatid union.

Complex:

d - Dicentric - an asymmetrical exchange between two chromosomes resulting in a chromosome with two centromeres with or without an accompanying acentric fragment which should not be score as a second aberration.

- r Ring inter-arm intrachange happening within the chromosome, leading to formation of a centric ring with or without a chromosome fragment. The fragment should not be scored as a second aberration.
- dm Double minutes intra-arm intrachanges leading to tight acentric paired rings.

3. Other Aberrations

- pu Pulverized chromosome or chromosomes shattering of chromatid material resulting in several minute pieces. The identity of the chromosome is not decipherable. Considered as a single aberration.
- sd Severely damaged cell cell with 10 or more aberrations.
- pp Polyploid cells metaphases with multiples or approximate multiples of the haploid set of chromosomes. Not scored for structural aberrations.
- e Endoreduplication metaphases with paired duplicated chromosomes or diplochromosomes; they are not scored for structural aberrations.

The chromosome aberration data from the score sheets were consolidated on a Summary Table using an Excel 2007 spreadsheet program. The number of aberrations per cell and the percentage of cells with one or more aberrations for each concentration level were calculated. The data were consolidated separately for the two cultures at each concentration, then pooled and presented together. Chromatid gaps and chromosome gaps were scored, but they were not included in calculating the percentage of cells with aberrations and the number of aberrations per cell. Of the remaining aberrations, each aberration scored was counted as one, except a severely damaged cell (sd), which was considered equal to 10 aberrations in calculating the number of aberrations per cell. Endoreduplicated and polyploid cells were recorded separately in percentages.

CONFIRMATORY CHROMOSOME ABERRATION ASSAY

A Confirmatory Chromosome Aberration Assay was performed without activation only, since the results from the Definitive Assay were negative. The concentrations tested were 500, 1000, 2000, 3000, 4000 and 5000 μ g/mL. The treatment time was 18 hours. The harvest time was 18 hours after the initiation of treatment (1.5 x normal cell cycle). MMC, at 0.2 and 0.4 μ g/mL, was the positive control. Chromosome aberrations from the Confirmatory Assay were scored at concentrations of 500, 1000 and 2000 μ g/mL. The untreated, solvent and positive (MMC at 0.4 μ g/mL) controls were also scored. Two hundred metaphases were scored from each concentration

and the controls.

STATISTICAL ANALYSIS

The data for the percentage of cells with aberrations for each concentration were compared to the solvent control values using the Chi-square test. Results were considered significant if $p \le 0.05$. Statistical analysis was not performed if the test concentration value was equal to or less than the concurrent or historical solvent control value.

If a positive response was indicated by the Chi-square test, the Cochran-Armitage test (trend test) was performed for evidence of a concentration-related response (10). The trend test was considered positive if $p \le 0.05$.

CRITERIA FOR A VALID ASSAY

- 1. In the solvent control, the percentage of cells with aberrations should not exceed 4%.
- 2. At least 25% of the cells scored in the positive control should show one or more chromosome aberrations.
- 3. At least one of the test concentrations scored should show approximately 50% reduction in the RCG and/or RMI. This requirement should not be applied to test articles where no apparent toxicity could be achieved at the maximum soluble concentration or the highest allowable concentration.

EVALUATION OF TEST RESULTS

Positive Response

The test article was considered to have caused a positive response in this assay if the test article showed a positive concentration-response trend and a statistically significant increase over that of the solvent controls in the percentage of cells with aberrations at one or more concentrations.

Negative Response

The test article was considered to have caused a negative response if none of the test concentrations showed a statistically significant increase in the percentage of aberrant cells.

Equivocal Response

The test article was considered to have caused an equivocal response if there was a statistically significant increase in the percentage of cells with aberrations without an accompanying positive concentration-response trend.

ARCHIVES

The raw data, documentation, protocol, protocol amendment/deviation and a copy of the Final Report, along with an electronic file containing data tables and the Final Report of the study, will be maintained by SITEK Research Laboratories at Dr. Kirby's private residence until arrangements are made to transfer them to the Sponsor.

RESULTS

SOLUBILITY TEST

Solubility test was not performed because Ethylenediamine dinitrate (EDDN) for this assay is 500 mg/mL in deionized, distilled water and the solvent is deionized, distilled water. 50 μ L of the test article at 500 mg/mL in DD Water was added to 5.0 mL of complete medium. The test article was miscible with the complete medium.

DOSING SOLUTION ANALYSIS

The dosing solutions were not analyzed in this study. Test article dosing solutions were made fresh before dosing and the test concentrations for the chromosome aberration test were selected based on the cytotoxicity data. The highest concentration for the chromosome aberration test was 5000 μ g/mL which was the maximum concentration required by OECD Test Guideline 473 because the test article was found toxic only at 5000 μ g/mL based on the Range Finding Test.

DETERMINATION OF pH

 $50~\mu L$ of the test article at 500~mg/mL in DD Water was added to 5.0~mL of complete medium, resulting in a final test article concentration of $5000~\mu g/mL$ in medium and the color of the medium was changed to yellow. Therefore 1 N NaOH was added to the treatment medium to adjust the pH to normal range.

RANGE FINDING TEST

The first Range Finding Test (A1 trial) was not valid because the cells with activation were inadvertently mixed with the cells without activation during the harvest. The data in this report were from A2 trial. The RCGs ranged from 81 to 110% in the non-activated system and 59 to 121% in the activated system, at concentrations of 0.5-5000.0 μ g/mL (Appendix I, Table 1). The RMIs ranged from 2 to 112% without activation. With activation the RMIs ranges were from 14 to 122%. (Appendix I, Table 2). Significant cytotoxicity was observed at 5000.0 μ g/mL both without and with the metabolic activation based on the RMIs.

DEFINITIVE CHROMOSOME ABERRATION ASSAY

Based on the toxicity results (RCGs and/or RMIs) from the Range Finding Test, the concentrations of 500, 1000, 2000, 3000, 4000 and $5000\mu g/mL$ both without and with activation were tested.

The parallel toxicity results, as determined by the reduction in the RCG and/or RMI of the

treated cells in the non-activated and activated systems, are presented in Tables 3 (RCG) and 4 (RMI) (Appendix I). In the non-activated system, the RCGs for the test article concentrations of 500, 1000, 2000, 3000, 4000 and 5000 µg/mL ranged from 16 to 83% and RMIs ranged from 1 to 111%. In the activated system, the RCGs for the test article concentrations of 500, 1000, 2000, 3000, 4000 and 5000 µg/mL ranged from 72 to 97+% and RMIs ranged from 37 to 150%. The chromosome aberrations were scored at the three concentrations which are 1000, 2000 and 3000 µg/mL without activation and 3000, 4000 and 5000 µg/mL with activation based on the toxicity data (RCGs and/or RMIs). In addition, the corresponding solvent and positive (MMC at 0.8 µg/mL and CP at 12.5 µg/mL) controls were also scored. One hundred (100) metaphases were scored from each of the two replicate cultures for each concentration and the controls. The results of the Definitive Chromosome Aberration Assay in the activated and non-activated systems are summarized and presented in Tables 5 and 6, respectively (Appendix I).

The averages of the percentage of cells with aberrations scored in the Definitive Chromosome Aberration Assay are summarized below:

Without A	ctivation	With Activation							
Treatment (µg/mL)	Chromosome	Treatment (µg/mL)	Chromosome						
Treatment Time: 3 Hours	Aberrations (% cells)	Treatment Time: 3 Hours	Aberrations (%						
			cells)						
Solvent (Water)*	0.5	Solvent (Water)*	0.5						
EDDN (1000)	0.5	EDDN (3000)	0.0						
EDDN (2000)	0.5	EDDN (4000)	0.0						
EDDN (3000)	0.5	EDDN (5000)	0.5						
MMC (0.80)	39.0**	CP (12.5)	34.0**						

^{*} Water was used as Solvent Control.

CONFIRMATORY CHROMOSOME ABERRATION ASSAY

Only the non-activated system was tested in the Confirmatory Assay. The Confirmatory Assay was performed at the concentrations of 500, 1000, 2000, 3000, 4000 and 5000 μ g/mL. The parallel toxicity results of the Confirmatory Assay, as determined by the reduction in the RCG and/or RMI of the treated cells, are presented in Tables 7 (RCG) and 8 (RMI) (Appendix I).

The RCGs for the test article concentrations of 500 to 5000 μ g/mL ranged from 36 to 74% and the RMIs ranged from 0 to 90%. Three concentrations which are 500, 1000 and 2000 μ g/mL were scored based on the toxicity data (RCGs and/or RMIs). In addition, the corresponding solvent and positive (MMC at 0.4 μ g/mL) controls were also scored. One hundred (100)

^{**} Statistically significant response using the Chi-square test (P= 0.000).

metaphases were scored from each of the two replicate cultures for each concentration and the controls.

The averages of the percentage of cells with aberrations scored in the Confirmatory Chromosome Aberration Assay are summarized below:

Treatment (µg/mL) Treatment time: 18 hours	Average (% Cells with Aberrations) Without Activation
Solvent (Water)*	0.0
EDDN (500)	0.0
EDDN (1000)	0.0
EDDN (2000)	0.5
MMC (0.40)	39.0**

^{*} Water was used as Solvent Control.

STATISTICAL ANALYSIS

Since the statistical analysis indicated that the test article did not induce a statistically significant increase in the percentage of cells with aberrations over the solvent controls in the Definitive or Confirmatory Chromosome Aberration Assays, it was not necessary to perform a trend test.

The percentage of polyploidy (pp) was in the normal range (0-5.0%) in both the Definitive and the Confirmatory Chromosome Aberration Assays. The percentages of endoreduplicated cells (e) were from 2.5 to 6.5 % without activation and from 0 to 7% with activation in the Definitive Assay. In the Confirmatory Assay the percentages of endoreduplicated were from 0.5 to 3.5%. The results from both the Definitive and the Confirmatory Assays exceed the published normal range (0-1.0%) and SITEK historical control data (0-2.5%) for water. This indicated the test article has the potential to inhibit cell cycle progression (11),

The SITEK's historical data for the negative controls (untreated) are presented in Appendix II.

^{**} Statistically significant response using the Chi-square test (P= 0.000).

CONCLUSIONS

The results from the Definitive and Confirmatory Chromosome Aberration Assays indicate that the test article, Ethylenediamine dinitrate (EDDN) (Lot number: ABY08L031S010, 99.5% pure) did not induce a statistically significant increase in the percentage of cells with aberrations both with and without metabolic activation when compared to the solvent controls, at the concentrations tested. Although the strength and stability of the test article, dosing solutions, under the experimental conditions, were not determined, the highest doses in both the Definitive and Confirmatory assays were found toxic to the test system which met the requirement of OECD Test Guideline 473. Therefore, under the conditions of this test and according to the criteria defined in the OECD test, EDDN, was determined to be negative (not clastogenic) both with and without metabolic activation in the CHO Chromosome Aberration Assay.

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APPENDIX I

DATA TABLES

TABLE 1 CHROMOSOME ABERRATION ASSAY IN CHO CELLS RCG - RANGE FINDING TEST

TEST ARTICLE: EDDN

SPONSOR: US ARMY

SOLVENT: Water

SITEK STUDY NO.: 1003-3110

TRIAL NO.: A2

	WITI	HOUT ACTIVATION	ON		T		WITH ACTIVATION	ON	
Test Article Conc. (µg/mL)		No. of Cells per Flask	Mean No. of Cells X 10 ⁶	RCG*	Test Article Conc. (µg/mL)		No. of Cells per Flask	Mean No. of Cells X 10 ⁶	RCG*
Solvent Solvent	A B	0.51 0.45	0.48	100%	Solvent Solvent	A B	0.88 0.73	0.81	100%
0.5 0.5	A B	0.38 0.40	0.39	81%	0.5 0.5	A B	0.96 1.00	0.98	121%
5 5	A B	0.54 0.52	0.53	110%	1	A B	0.58 0.76	0.67	83%
10 10	A B	0.52 0.50	0.51	106%	5 5	A B	0.91 0.89	0.90	111%
50 50	A B	0.49 0.44	0.47	98%	10 10	A B	0.72 0.74	0.73	90%
100 100	A B	0.54 0.46	0.50	104%	50 50	A B	0.85 0.84	0.85	105%
500 500	A B	0.47 0.46	0.47	98%	100 100	A B	0.73 0.72	0.73	90%
1000 1000	A B	0.37 0.46	0.42	88%	500 500	A B	0.67 0.82	0.75	93%
5000 5000	A B	0.34 0.43	0.39	81%	1000 1000	A B	0.48 0.48	0.48	59%

*RCG = Relative Cell Growth =

No. of Cells in the Test Flask
No. of Cells in the Solvent Flask

X 100

Verified by: QA_RK SD_3/35/10

SITEK Study No. 1003-3110

TABLE 2 CHROMOSOME ABERRATION ASSAY IN CHO CELLS MITOTIC INDEX - RANGE FINDING TEST

SPONSOR: USA RDECOM, AMSRD-MSF

TEST ARTICLE: EDDN

SOLVENT: WATER

STUDY NO.: 1003-3110

TRIAL NO.: A2

Without Activation - Tre	eatme	ent:	3 Hours	larvest:	18 Hours	With Activation - Trea	tmen	t: 3	Hours Ha	rvest: 1	8 Hours
Test Article			No. of	Mean	Relative	Test Article			No. of	Mean	Relative
Concentration	Τι	ıbe	Dividing	Mitotic	Mitotic	Concentration	Tube		Dividing	Mitotic	Mitotic
(µg/mL)	No.		Cells/500 Index Index (µg/mL)		(µg/mL)	No.		Cells/500	Index	Index	
	70	Α	87				30	Α_	71		
Solvent	70	В	75	16.2	100%	Solvent	30	В	86	15.7	100%
	62	Α	76				53	Α	89		
0.5	62	В	77	15.3	94%	0.5	53	В	81	17.0	108%
	42	Α	34				50	Α	82		
5	42	В	65	9.9	61%	5	50	В	110	19.2	122%
	36	Α	38				15	Α	92		
10	36	В	73	11.1	69%	10	15	В	96	18.8	120%
	46	Α	30				48	Α	71		
50	46	В	85	11.5	71%	50	48	В	51	12.2	78%
	13	Α	68			· ····	96	Α	86		
100	13	В	63	13.1	81%	100	96	В	89	17.5	111%
	57	Α	77				14	A	78		
500	57	В	64	14.1	87%	500	14	В	98	17.6	112%
	59	Α	93	}			5	Α	67		
1000	59	В	89	18.2	112%	1000	5	В	65	13.2	84%
	12	Α	2				16	Α	<u>12</u>		
5000	12	В	1	0.3	2%	5000	16	В	10	2.2	14%

MI = No. of dividing cells scored from 1000 cells

RMI = <u>Test Dose MI</u> X 100 Solvent Control MI

Verified by: QA_RK___ SD_2/25/10

TABLE 3 CHROMOSQME ABERRATION ASSAY IN CHO CELLS **RCG - DEFINITIVE ASSAY**

TEST ARTICLE: EDDN

SPONSOR:

US ARMY

SOLVENT: WATER

SITEK STUDY NO.: 1003-3110

TRIAL NO.: B1

	WIT	HOUT ACTIVATION	ON				WITH ACTIVATION	ON	
Test Article Conc. (µg/mL)		No. of Cells per Flask	Mean No. of Cells X 10 ⁶	RCG*	Test Article Conc. (µg/mL)		No. of Cells per Flask	Mean No. of Cells X 10 ⁶	RCG*
Solvent Solvent	A B	1.72 2.20	1.96	100%	Solvent Solvent	A B	1.49 1.33	1.41	100%
500 500	A B	1.47 1.78	1.63	83%	500 500	A B	1.42 1.32	1.37	97%
1000 1000	A B	1.51 1.50	1.51	77%	1000 1000	A B	1.15 1.00	1.08	77%
2000 2000	A B	1.41 1.37	1.39	71%	2000 2000	A B	1.39 1.22	1.31	93%
3000 3000	A B	1.24 1.08	1.16	59%	3000 3000	A B	1.17 1.28	1.23	87%
4000 4000	A B	0.58 0.77	0.68	35%	4000 4000	A B	1.13 1.11	1.12	79%
5000 5000	A B	0.20 0.42	0.31	16%	5000 5000	A B	1.08 0.96	1.02	72%
MMC 0.4 MMC 0.4	A B	1.21 1.10	1.16	59%	CP 7.5 CP 7.5	A B	0.80 0.75	0.78	55%
MMC 0.8 MMC 0.8	A B	1.05 0.92	0.99	66%	CP 12.5 CP 12.5	A B	0.80 0.78	0.79	56%

X 100

*RCG = Relative Cell Growth = No. of Cells in the Test Flask

No. of Cells in the Solvent Flask

Verified by: QA R SD 3/25/10

SITEK Study No. 1003-3110

TABLE 4 CHROMOSOME ABERRATION ASSAY IN CHO CELLS MITOTIC INDEX - DEFINITIVE ASSAY

SPONSOR: USA RDECOM, AMSRD-MSF

SOLVENT: WATER

STUDY NO.: 1003-3110

TEST ARTICLE: EDDN TRIAL NO.: B1

Without Activation - Tre	eatme	ent:	3 Hours F	larvest: 1	8 Hours	With Activation - Trea	tmen	t: 3	Hours Ha	rvest: 1	8 Hours
Test Article			No. of	Mean	Relative	Test Article			No. of	Mean	Relative
Concentration	Tu	ıbe	Dividing	Mitotic	Mitotic	totic Concentration		ube	Dividing	Mitotic	Mitotic
(µg/mL)	No.		Cells/500	Index	Index	(µg/mL)	No.		Cells/500	Index	Index
	47	Α	69				39	Α_	68		:
Solvent	47_	В	74	14.3	100%	Solvent	39	В	55	12.3	100%
	4	Α	78				57	Α	71		
500	4	В	81	15.9	111%	500	57	В	61	13.2	107%
	84	Α	39				41	Α	96		
1000	84	В	59	9.8	69%	1000	41	В	88	18.4	150%
	67	Α	49				48	Α	51		
2000	67	B 60 10.9 76% 2000		48	В	93	14.4	117%			
	16	16 A 30					5	Α	88		
3000	16	В	15	4.5	31%	3000	5	В	96	18.4	150%
	9	Α	2				35	Α	35		
4000	9	В	4	0.6	4%	4000	35	В	39	7.4	60%
	26	Α	0				71	Α	20		
5000	26	В	1	0.1	1%	5000	71	В	25	4.5	37%
	88	Α	28				85	Α	27		
MMC 0.4	88	В	52	8.0	56%	CP 7.5	85	В	30	5.7	46%
	90	Α	24				73	Α	17		
MMC 0.8	90	В	32	5.6	39%	CP12.5	73	В	22	3.9	32%

The positive controls were compared to Solvent since the solvent for MMC and CP was water.

MI = No. of dividing cells scored from 1000 cells

from 1000 cells RMI = Test Dose MI X 100
Solvent Control MI

Verified by: QA PK SD2/25/10

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SITEK Study No. 1003-3110

TABLE 5 CHROMOSOME ABERRATION ASSAY IN CHOCELLS CHROMOSOME ABERRATIONS - DEFINITIVE ASSAY

TEST ARTICLE: EDDN

TREATMENT TIME: 3 Hours

SITEK STUDY NO.: 1003 - 3110

SPONSOR: USA RDECOM, AMSRD-MSF

HARVEST TIME: 18 Hours

TRIAL NO.: B1

SOLVENT: Water

METABOLIC ACTIVATION: Yes () No (X)

			NUMBER AND TYPE OF ABERRATIONS													NO. OF	%				
TREATMENT	CELLS		NO	Г			Chr	omat	id Ty	pe			Chron	osm	е Туг	ре			ABS.	CELLS	P-VALUE
AND CONC.	Scored	CO	MPU'		r	Simp			Com	olex			Simple		omple		Othe		PER	WITH	IN CHI-
(μg/mL)		tg	sg	%е	%pp	tb	isb	tr	qr	cr	id	ci	sb	d	r	dm	pu	sd*	CELL	ABS.	SQUARE**
Solvent A	100			0	2	L	<u> </u>		<u> </u>										0.00	0.0	
Solvent B	100			0	0	1		<u> </u>								<u> </u>			0.01	1.0	
Solvent A+B	200	0	0	0.0	1.0	1	0	0	0	0	0	0	0	0	0	0	0	0	0.005	0.5	
1000 A	100			4	0	1													0.01	1.0	
1000 B	100			1	1				L										0.00	0.0	
1000 A+B	200	0	0	2.5	0.5	1	0	0	0	0	0	0	0	0	0	0	0	0	0.005	0.5	= Solvent
2000 A	100			7	2	1													0.01	1.0	
2000 B	100			4	0											<u></u>			0.00	0.0	
2000 A+B	200	0	0	5.5	1.0	1	0	0	0	0	0	0	0	0	0	0	0	0	0.005	0.5	= Solvent
3000 A	100			10	2														0.00	0.0	
3000 B	100			3	0			1											0.01	1.0	
3000 A+B	200	0	0	6.5	1.0	0	0	1	0	0	0	0	0	0	0	0	0	0	0.005	0.5	= Solvent
MMC 0.8 A	100	0	0	1	3	14	0	13	8	0	1	1	13	0	2	0	0	0	0.52	40.0	
MMC 0.8 B	100	0	0	0	0	9	5	8	9	17	3	3	10	0	0	0	3	0	0.67	38.0	
MMC 0.8 A+B	200	0	0	0.5	1.5	23	5	21	17	17	4	4	23	0	2	0	3	0	0.595	39.0	p= 0.0000

^{*} sd = 10 aberrations in calculations.

Verified by: QA RK SD 2/35/10

^{***}Statistical analyses done on the % cells with aberrations and with concurrent solvent control.

In Chi-square test MMC compared to the concurrent solvent control data since the solvent for MMC was water.

SITEK Study No. 1003-3110

TABLE 6 CHROMOSOME ABERRATION ASSAY IN CHO CELLS CHROMOSOME ABERRATIONS - DEFINITIVE ASSAY

TEST ARTICLE: EDDN

TREATMENT TIME: 3 Hours

SITEK STUDY NO.: 1003 - 31100

SPONSOR: USA RDECOM, AMSRD-MSF

HARVEST TIME: 18 Hours

TRIAL NO.: B1

SOLVENT: WATER

METABOLIC ACTIVATION: Yes (X) No ()

			NUMBER AND TYPE OF ABERRATIONS														NO. OF	%			
TREATMENT	CELLS		NO	г			Chr	omat	id Ty	ре			Chron	ıosm	е Тур	e			ABS.	CELLS	P-VALUE
AND CONC.	Scored	CO	MPU'			Simp		_	Comp	lex			Simple		comple		Othe	_	PER	WITH	IN CHI-
(μg/mL)		tg	sg	%е	%рр	tb	isb	tr	qr	cr	id	ci	sb	_d	Г	dm	pu	sd*	CELL	ABS.	SQUARE**
Solvent A	100			1	2					ļ									0.00	0.0	
Solvent B	100			1	0	1													0.01	1.0	
Solvent A+B	200	0	0	1.0	1.0	1	0	0	0	0	0	0	0	0	0	0	0	0	0.005	0.5	
3000 A	100			10	2														0.00	0.0	
3000 B	100_			4	0														0.00	0.0	
3000 A+B	200	0	0	7.0	1.0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.000	0.0	< Solvent
4000 A	100			0	2														0.00	0.0	
4000 B	100			3	0														0.00	0.0	
4000 A+B	200	0	0	1.5	1.0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.000	0.0	< Solvent
5000 A	100			0	3														0.00	0.0	
5000 B	100			0	0	1	<u> </u>		L				<u></u>						0.01	1.0	
5000 A+B	200	0	0	0.0	1.5	1	0	0	0	0	0	0	0	0	0	0	0	0	0.005	0.5	≒ Solvent
CP 12.5 A	100	0	0	0	1	15	0	8	3	0	0	1	16	0	2	0	0	0	0.45	37.0	
CP 12.5 B	100	0	0	0	0	6	8	5	8	4	4	4	6	0	0	0	1	0	0.46	31.0	
CP 12.5 A+B	200	0	0	0.0	0.5	21	8	13	11	4	4	5	22	0	2	0	1	0	0.455	34.0	p = 0.0000

^{*} sd = 10 aberrations in calculations.

In Chi-square test CP compared to the concurrent solvent control data since the solvent for CP was water.

Verified by: QA PK SD 2/35/10

^{**}Statistical analyses done on the % cells with aberrations and with concurrent solvent control.

TABLE 7 CHROMOSOME ABERRATION ASSAY IN CHO CELLS RCG - CONFIRMATORY ASSAY

TEST ARTICLE: EDDN

SPONSOR:

USA RDECOM, AMSRD-MSF

SOLVENT: Water

SITEK STUDY NO.: 1003-3110

TRIAL NO.: B2

	WIT	HOUT ACTIVATION)N		
Test Article Conc. (µg/mL)		No. of Cells per Flask	Mean No. of Cells X 10 ⁶	RCG*	
Solvent Solvent	A B	1.73 1.62	1.68	100%	
500 500	A B	1.16 1.32	1.24	74%	
1000 1000	A B	0.96 0.87	0.92	55%	
2000 2000	A B	0.84 0.84	0.84	50%	Activated not performed
3000 3000	A B	0.54 0.65	0.60	36%	
4000 4000	A B	0.75 0.75	0.75	45%	
5000 5000	A B	0.60 0.68	0.64	38%	
MMC 0.4 MMC 0.4	A B	1.06 1.12	1.09	65%	
MMC 0.8 MMC 0.8	A B	0.83 1.19	1.01	110%	

*RCG = Relative Cell Growth =

No. of Cells in the Test Flask X 10

Verified by: QA PK SD 2/25/10

SITEK Study No. 1003-3110

TABLE 8 CHROMOSOME ABERRATION ASSAY IN CHO CELLS MITOTIC INDEX - CONFIRMATORY ASSAY

SPONSOR: USA RDECOM, AMSRD-MSF

TEST ARTICLE: EDDN

SOLVENT: WATER

STUDY NO.: 1003-3110

TRIAL NO.: B2

11011 1 1 1 7		-	0.11			
Without Activation - Tr	eatme	nt: 1		arvest: 18 H		
Test Article	1		No. of	Mean	Relative	·
Concentration	Tu	ıbe	Dividing	Mitotic	Mitotic	
(µg/mL)	No.		Cells/500	Index	Index	
	9	Α	46			
Solvent	9_	В	67	11.3	100%	
	69	Α	45			
500	69	В	57	10.2	90%	
	66	Α	40			
1000	66	В	38	7.8	69%	Activated not performed
	34	Α	24			
2000	34	В	26	5.0	44%	
	18	Α	2			
3000	18	В	1	0.3	3%	
A	41	Α	0			
4000	41	В	0	NA	NA	
	84	Α	0			
5000	84	В	0	NA	NA	
	39	A	24			
MMC 0.4	39	В	19	4.3	38%	
	51	Α	12			
MMC 0.8	51	В	18	3.0	27%	

The positive controls were compared to Solvent since the solvent for MMC and CP was water.

MI = No. of dividing cells scored from 1000 cells

10

RMI = <u>Test Dose MI</u> X 100 Solvent Control MI

Verified by: QA_PK SD_3/25/10

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SITEK Study No. 1003-3110

TABLE 9 CHROMOSOME ABERRATION ASSAY IN CHO CELLS CHROMOSOME ABERRATIONS - CONFIRMATORY ASSAY

TEST ARTICLE: EDDN

TREATMENT TIME: 18 Hours

SITEK STUDY NO.: 1003 - 3110

SPONSOR: USA RDECOM, AMSR-MSF

HARVEST TIME: 18 Hours

TRIAL NO.; B2

SOLVENT: Water

METABOLIC ACTIVATION: Yes () No (X)

			NUMBER AND TYPE OF ABERRATIONS									NO. OF	%								
TREATMENT	CELLS		NO	r			Chr	omat	id Ty	рe			Chron	108m	е Туј)e			ABS.	CELLS	P-VALUE
AND CONC.	Scored	CO	MPU	TED		Simp			Com	olex			Simple	-	ompl	ex	Othe	rs	PER	WITH	IN CHI-
(μg/mL)		tg	sg	%е	%pp	tb	isb	tr	qr	cr	id	ci	sb	d	r	dm	pu	sd*	CELL	ABS.	SQUARE**
Solvent A	100			0	1														0.00	0.0	
Solvent B	100			0	0				<u> </u>										0.00	0.0	
Solvent A+B	200	0	0	0.0	0.5	0	0	0	0	0	0	0	0	0	0	0	0	0	0.000	0.0	
500 A	100			0	1														0.00	0.0	
500 B	100	_		_1	0														0.00	0.0	
500 A+B	200	0	0	0.5	0.5	0	0	0	0	0	0	0	0	0	0	_ 0	0	0	0.000	0.0	p = solvent
1000 A	100			2	2														0.00	0.0	
1000 B	100			5	0					<u> </u>									0.00	0.0	
1000 A+B_	200	0	0	3.5	1.0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.000	0.0	p = solvent
2000 A	100			1	0														0.00	0.0	
2000 B	100			_ 2	0	1													0.01	1.0	
2000 A+B_	200	0	0	1.5	0.0	1	0	0	0	0	0	0	0	0	0	0	0	0	0.005	0.5	p = 0.4130
MMC 0.4 A	100	0	0	0	1	13	0	14	6	0	0	_5	9	0	3	0	0	0	0.50	39.0	
MMC 0.4 B	100	0	0	0	0	3	5	8	9	11	8	4	4	0	0	0	7	0	0.59	39.0	
MMC 0.4 A+B	200	0	0	0.0	0.5	16	5	22	15	11	8	9	13	0	3	0	7	0	0.545	39.0	p = 0.0000

^{*} sd = 10 aberrations in calculations.

Verified by: QA PIL SD 2/25/10

^{**}Statistical analyses done on the % cells with aberrations and with SITEK's historical data (0.13%) since the concurrent solvent control was 0%.

In Chi-square test MMC compared to SITEK's historical Untreated control data (0.13%) since the solvent for MMC was water and the concurrent value is 0%.

APPENDIX II

SITEK'S HISTORICAL DATA FOR NEGATIVE CONTROLS (UNTREATED)

HISTORICAL DATA FOR NEGATIVE CONTROL (UNTREATED) CHO IN VITRO CHROMOSOME ABERRATION ASSAY

NON - ACTIVATED SYSTEM

STUDY	# OF METAPHASES	%CELLS	Cells
NUMBER	SCORED	WITH ABS.	WITH ABS
0710-3110	200	0.0	0
0710-3110	200	0.5	1
712-3110	200	0.0	0
0712-3110	200	0.5	1
716-3110	200	0.0	0
716-3110	200	0.5	1
727-3110	200	0.0	0
727-3110	200	0.0	0
733-3110	200	0.0	0
733-3110	200	0.0	0
)735/0736-3110	200	0.5	1 `
735-3110	200	0.0	0
736-3110	200	0.0	0
736-3110	200	0.0	0
738/0740/0741-3110	200	0.0	0
738/0740/0741-3110	200	0.0	0
739-3110	200	0.0	0
739-3110	200	0.0	0
745-3110	200	0.0	0
745-3110	200	0.0	0
760-3110	200	0.0	0
760-3110	200	0.0	Ö
761-3110	200	0.0	0
761-3110	200	0.0	0
771-3110	200	0.0	Ö
771-3110	200	0.0	Ö
788-3110	200	0.5	1
790-3110	200	0.5	1
790-3110	200	0.5	1
795-3110	200	0.5	i
795-3110	200	0.0	ó
799-3110	200	0.0	ŏ
800-3110	200	0.0	ő
800-3110	200	0.5	1
820-3110	200	0.0	Ö
1833-3110	200	0.5	1
1833-3110 1833-3110	200	0.0	0
1835-3110 1835-3110	200	0.0	0
1836-3110 1836-3110	200	0.0	0
1836-3110 1836-3110	200 200		
		0.0	0
840-3110	200	0.0	0
)840-3110 2040-0440	200	0.0	0
849-3110	200	0.5	1
849-3110	200	0.0	0
Total 44	8800		. 11
24NOF - 0.0 - 0.557		MEAN	± S.D.
RANGE : 0.0 - 0.5%		0.13	± 0.22

OCT.2001 - SEP.2005

HISTORICAL DATA FOR NEGATIVE CONTROL (UNTREATED) CHO IN VITRO CHROMOSOME ABERRATION ASSAY

ACTIVATED SYSTEM

STUDY	PHASE	# OF METAPHASES	%CELLS	CELLS
NUMBER		SCORED	WITH ABS.	WITH ABS
0710-3110	B1	200	1.0	2
0712-3110	B1	200	0.5	1
0716-3110	B1	200	0.5	1
0727-3110	B1	200	0.5	1
0733-3110	B1	200	0.5	1
0735/0736-3110	B1	200	0.0	0
0735-3110	B2	200	1.5	3
0736-3110	B2	200	1.5	3
0738/0740/0741-3110	B2	200	0.0	0
0739-3110	B2	200	0.0	0
0745-3110	B1	200	0.0	0
0760-3110	B2	200	0.0	0
0760-3110	B6	200	0.0	0
0761-3110	B2	200	0.0	0
0761-3110	B6	200	0.0	0
0771-3110	B1	200	0.0	0
0788-3110	B1	200	0.5	1
0790-3110	B1	200	0.5	1
0795-3110	B1	200	0.5	1
0795-3110	B2	200	0.5	1
0799-3110	B1	200	1.0	2
0799-3110	B2	200	0.0	0
0800-3110	B1	200	0.0	0
0820-3110	B1	200	0.0	0
0833-3110	B2	200	0.5	1
0836-3110	B1	200	0.0	0
0840-3110	B1	200	0.0	0
0849-3110	B1	200	0.0	0
Total 28		5600		19
			MEAN ±	S.D.
RANGE: 0.0 - 1.5%			0.34 ±	0.45

OCT.2001 - SEP.2005

HISTORICAL %e AND % pp DATA FOR UNTREATED (water only) NEGATIVE CONTROL CHO IN VITRO CHROMOSOME ABERRATION ASSAY

NON-ACTIVATED

STUDY NUMBER	PHASE	# OF METAPHASES SCORED	% e	% рр
0712-3110	B1	100	0.0	0.0
0712-3110	B2	100	0.0	0.0
0727-3110	B1	100	0.5	0.0
0727-3110	B2	100	0.0	0.0
0735/0736-3110	B1	100	0.0	0.0
0735-3110	B1	100	1.0	0.0
0736-3110	B1	100	1.0	0.0
0736-3110	B3	100	0.0	0.0
0738/0740/0741-3110	B1	100	0.5	0.0
0738/0740/0741-3110	B3	100	0.0	0.0
0739-3110	B1	100	0.5	0.0
0739-3110	B 3	100	0.0	0.0
0771-3110	B1	100	0.0	0.0
0771-3110	B2	100	0.0	0.0
0788-3110	B1	100	0.0	0.0
0800-3110	B 1	100	0.0	0.5
0800-3110	B2	100	0.0	0.5
0820-3110	B1	100	0.0	0.5
0835-3110	B1	100	0.0	0.0
0836-3110	B1	100	0.0	0.5
0836-3110	B2	100	0.0	0.0

%e RANGE : 0.0 - 1.0% %pp RANGE : 0.0 - 0.5% MEAN ± S.D.:

% e 0.17 ± 0.33 %pp 0.10 ± 0.20

n = 21

OCT 2001 - SEP 2005

HISTORICAL %e AND % pp DATA FOR UNTREATED (water only) NEGATIVE CONTROL CHO IN VITRO CHROMOSOME ABERRATION ASSAY

ACTIVATED

				n = 1	13
		% <u>r</u>	p 0.04	±	0.14
%pp RANGE: 0.0 - 0.5%		%	e 1.00	±	0.79
%e RANGE : 0.0 - 2.5%		M	IEAN ± S.D	.:	
0836-3110	B1	100	0.5		0.0
0835-3110	B1	100	0.5		0.5
0820-3110	B1	100	0.5		0.0
0800-3110	B1	100	2.5		0.0
0788-3110	B1	100	2.0		0.0
0771-3110	B1	100	0.0		0.0
0739-3110	B2	100	0.5		0.0
0738/0740/0741-3110	B2	100	0.5		0.0
0736-3110	B2	100	1.5		0.0
0735-3110	B2	100	1.5		0.0
0735/0736-3110	B1	100	1.5		0.0
0727-3110	B1	100	1.5		0.0
0712-3110	B1	100	0.0		0.0
STUDY NUMBER	PHASE	# OF METAPHASES SCORED	% e		% pp

OCT 2001 - SEP 2005

APPENDIX III

STUDY PROTOCOL, PROTOCOL AMENDMENT



TEST FOR CHEMICAL INDUCTION OF CHROMOSOME ABERRATIONS IN CULTURED CHINESE HAMSTER OVARY (CHO) CELLS WITH AND WITHOUT METABOLIC ACTIVATION

This protocol is presented in two parts. Part One is designed to collect specific information pertaining to the test article and study. Part Two describes the study design in detail. Please complete all bolded sections in Part One and sign section 8.0 to approve the protocol.

PART ONE

1.0	SPO	ONSOR		
	1.1	Name: USA RDECOM	AMSRD-MSF	
		Environmental A	Acquisition & Logistics Sustaining Program	
	1.2	Address: Aberdeen Provi	ng Ground, MD 21010	
•	1.3	Sponsor's Study Coordinator	: Gunda Reddy, Ph.D., DABT	
2.0	TES	TING FACILITY		
	2.1	Name: SITEK Research Lab	oratories	
	2.2	Address: 15235 Shady Grove l Rockville, Maryland		
	2.3	Study Director: Jian Song, Ph.	D.	
3.0	STU	DY NUMBERS		
	*3.1	Testing Facility's Study No.:	1003-3110	
	3.2	Sponsor's Study No.:	Not Available	
4.0	TES	T ARTICLE		
regu	s incl	udes identification, lot number,	ization information must be provided in the final rep purity, stability, source, and expiration date. As a information will be cited as a GLP violation in ection of the final report.	per
*To	be co	empleted by the Testing Facility.		,
P1	otoco	l No. 3110.AB 051908	Page 1 of 18	— 3

SITEK RESEARCH LABORATORIES

SITEK Study No. 1003-3110

4.1	<u>Identification</u>	
	Name: Ethylenediamine dinitrate (EDDN)	
	Batch/Lot No.: To be provided	
4.2	2 Description	
	Color: White to off-white	
	Physical Form: Powder	
4.3	3 Analysis	
	Purity Information: 99.5%	
	Does the Sponsor require the use of a correction factor to account for impo	urity?
	YesXNo	
٠,	If yes, what is the correction factor?	
oe the res	remination of the test article characteristics as defined by Good Laboratory Pracesponsibility of the Sponsor. The specific GLP references for U.S. agencies are: .105; EPA TSCA = 40 CFR, 792.105 and EPA FIFRA = 40 CFR 160.105.	tices will FDA = 21
4.4	Stability Stability	
	Storage Conditions (check one):	
	X Dry/Room Temperature Refrigerated (1-5°C)	
	Frozen (-10 to -20°C)	
	Other (please specify):	
	Expiration Date: Not Available	
4.5	Preferred Solvent (check one):	
	X H ₂ O Culture Medium DMSO Acetone Eth	anol
	Other (please specify):	·
	To be decided by the Testing Facility	
Protoco	ol No. 3110.AB 051908 Page 2	2 of 18

4.6 Special Handling Instructions:

Use Standard Laboratory Safety Practices For Avoiding Exposure To

Hazardous Substances And Follow Safety Requirement For Explosive Material.

5.0 REGULATORY AGENCY SUBMISSION

5.1 Test Design Specifications

This study protocol is designed to meet or exceed the U.S. EPA, ICH and OECD Guidelines specified in the following documents (1, 2, 3):

United States Environmental Protection Agency, Title 40 Code of Federal Regulations Part 798, Health Effects Testing Guidelines, Subpart F, Section 798.5375, *In Vitro* mammalian cytogenetics. Revised July 1, 2002.

OECD Guideline for the Testing of Chemicals, No. 473. In Vitro Mammalian Chromosome Aberration Test. Adopted July 21, 1997.

International Conference on Harmonisation of Technical Requirements for Registration of Pharmaceuticals for Human Use. ICH Harmonised Tripartite Guideline S2A. <u>Guidance on Specific Aspects of Regulatory Genototxicity Tests for Pharmaceuticals</u>. Federal Register 61 (80):18198-18202, 1996.

5.2 Good Laboratory Practices

This study will be conducted in compliance with the following Good Laboratory Practice standards:

United States Environmental Protection Agency, Title 40 Code of Federal Regulations Parts 160 and 792, Revised July 1, 2005.

United States Food and Drug Administration, Title 21 Code of Federal Regulations Part 58, Revised April 1, 2005.

Japanese Ministry of Agriculture, Forestry and Fisheries, 11 NohSan, Notification No. 6283, October 1, 1999.

Japanese Ministry of Health and Welfare, Ordinance No. 21, April 1, 1997.

Japanese Ministry of International Trade and Industry, Notification No. 85, Basic Industries Bureau, March 31, 1984.

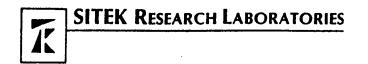
Organisation for Economic Cooperation and Development, The OECD Principles of Good Laboratory Practice, Environment Monograph No. 45 [ENV/MC/ CHEM(98)17], Paris-1998.

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nforming SITEK's Study Director of such must be provided.
If the subcontract work is not performed under the GLPs, a statement by the Sponsor
 All subcontract and/or Sponsor Quality Assurance audit findings and comments. Any deviations and/or amendments, if applicable. An original or copy of the analysis report. Location (address) of where the raw data from the analysis will be archived by the Sponsor or Subcontractor.
***Please note: All work pertaining to this study that is performed outside of SITEK is the responsibility of SITEK's Study Director. Therefore, as required by the GLPs, all of the following must be forwarded to the Study Director:
** Additional charges will apply. See Special Services price schedule.
What dosing solutions will be analyzed?
SITEK Research Laboratories Sponsor***
Dosing solution analysis will be performed by:
Alternatively, the Sponsor will be responsible for determining the strength and stability of the dosing solutions.
or if requested by the Sponsor, SITEK Research Laboratories will develop the method of analysis.
If requested by the Sponsor, SITEK Research Laboratories will determine the strength and stability of the dosing solutions. The method of analysis may be provided by the Sponsor,
If yes, please complete the rest of this section.
Yes** <u>X</u> No
Does the Sponsor want dosing solution analysis?
The Sponsor will be responsible for determining the strength and stability of the dosing solutions. The U.S. requirements for analysis of dosing solutions are specified in: FDA = 21 CFR, 58.113; EPA TSCA = 40 CFR, 792.113 and EPA FIFRA = 40 CFR 160.113, and OECD GLPs, Section 6.2.
6.0 DOSING SOLUTIONS
If so, which agency(ies)? Worldwide
X Yes No
Will this study be submitted to a regulatory agency?



From the Range Finding Test?	
Yes No	•
From the Assay?	
Yes No	
Which concentration(s)?	=
What amount of each concentration?	
At what temperature should the dosing solutions be stored?	
Room Temperature Frozen (-10 to -20°C)	
Refrigerated (1-5°C)	
At what temperature should the dosing solutions be shipped?	
Room Temperature On Wet Ice	
On Dry Ice	
7.0 STUDY DATES	
*7.1 Proposed Experimental Start Date: August 12, 2009	
Defined as the first date the test article is applied to the test system.	
*7.2 Proposed Experimental Completion Date: September 25, 2009 Defined as the last date on which data are collected directly from the study.	
*7.3 Proposed Draft Report Date: October 2, 2009	
7.4 Final Report: The final report will be initiated sixty days after remit report and issued no later than thirty days thereafter.	tance of the draft
una.	
*To be completed by the Testing Facility.	program.
Protocol No. 3110.AB 051908	Page 5 of 18

8.0 PROTOCOL APPROVAL

* Study Director

8-5-2009 Date

Sponsor's Study Coordinator

Quality Assurance Manager

* <u>() M</u>

Augg 5,09 Date

8-5-09 Date

8-5-09 Date

^{*}To be completed by the Testing Facility.

STUDY DESIGN

PART TWO

9.0 PURPOSE

The purpose of this study is to evaluate the test article for its potential to cause genetic damage as manifested by induced chromosome aberrations in cultured Chinese hamster ovary (CHO) cells.

10.0 JUSTIFICATION FOR SELECTION OF TEST SYSTEM

The CHO cells have been used extensively in the Chromosome Aberration Assay and have been demonstrated to be effective in detecting the clastogenic activity of chemicals from a wide range of chemical classes (4-7).

11.0 ABBREVIATIONS

СНО	· ·	Chinese Hamster Ovary
CP	-	Cyclophosphamide
DMSO	-	Dimethyl Sulfoxide
G-6-P	-	Glucose-6-phosphate
HEPES	-	N-(2-Hydroxyethyl)piperazine-N'-(2-ethanesulfonic acid)
HIFBS	-	Heat-Inactivated Fetal Bovine Serum
KCl	-	Potassium Chloride
MMC	-	Mitomycin-C
MI	-	Mitotic Index
NADP	-	Nicotinamide-adenine Dinucleotide Phosphate (Sodium Salt)
DPBS	-	Dulbecco's Phosphate Buffered Saline (with Ca ⁺⁺ and Mg ⁺⁺)
PBS	. =	Phosphate Buffered Saline (without Ca ⁺⁺ and Mg ⁺⁺)

Relative Mitotic Index

Protocol No. 3110.AB 051908

RMI

Complete Culture Medium - McCoy's 5A medium supplemented with 10% HIFBS, 2mM L-glutamine, 50 units/mL of penicillin and 50 µg/mL of streptomycin

Antibiotic-Free Medium - McCoy's 5A medium supplemented with 10% HIFBS and 2mM L-glutamine

12.0 INDICATOR CELLS

12.1 Source

The clone CHO-W-Bl of the CHO cell line, used in this study, originated at Litton Bionetics and was obtained by SITEK through the Environmental Health Research and Testing Laboratories, Lexington, Kentucky, in 1988. The doubling time of this cell line is approximately 12 hours, and its modal chromosome number is 21. The karyotype analysis of the cell line is periodically performed and documented at SITEK Research Laboratories.

12.2 Culture Conditions

The stock cultures of CHO cells are routinely grown in T-75 cm² sterile, plastic tissue culture flasks in antibiotic-free medium. The test cultures are grown in T-25 cm² plastic tissue culture flasks in complete medium. The cultures are kept in a humidified incubator maintained at approximately 37°C in an atmosphere of approximately 5% CO₂ and 95% air.

The stock cultures are routinely subcultured before confluency using 0.05% trypsin for dissociating the cells.

12.3 Stock Cultures

The CHO cells were propagated in antibiotic-free medium to obtain a sufficient number of cells for freezing a large number of stock ampules. The cells were cryopreserved in McCoy's 5A medium supplemented with 10% heat-inactivated fetal bovine serum (HIFBS) and 8% dimethyl sulfoxide (DMSO) and stored in liquid nitrogen. Prior to using the stock cultures for the test, representative ampules will be tested for contaminating microorganisms, including mycoplasma and also for karyotype stability. Stock ampules free of contaminating organisms will be used to initiate the stock cultures for the test. The cell cultures obtained from the stock ampules will be maintained by subculturing for a maximum of 15 passages and used to initiate cultures for the assays.

13.0 ROUTE OF ADMINISTRATION OF TEST ARTICLE

The test article will be administered *in vitro* directly or through a solvent compatible with the test system. This is the only route of administration available in this test system.

14.0 TEST SYSTEM IDENTIFICATION

All test cultures will be labeled in indelible ink with the SITEK study number, the test article concentrations/controls, the activation system, code number for the concentrations, A or B/C or D designating tubes receiving the same treatment, date of harvest and any other information that is pertinent to the Assay. Slides will be labeled with the SITEK study number, the code numbers for the concentrations tested, followed by A or B/C or D for the same treatment conditions and the date the slides are prepared.

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15.0 CONTROL SUBSTANCES

15.1 Positive Controls

Mitomycin-C (MMC), which causes chromosome aberrations without metabolic activation, will be dissolved in water and used at 0.4 and/or 0.8 μ g/mL for 3-hour treatment and 0.2 and 0.4 μ g/mL for the 18-hour treatment in the non-activated system.

Cyclophosphamide (CP), which requires metabolic activation, will be dissolved in water and used at 7.5 and/or 12.5 µg/mL in the activated system.

The specific source, lot number, CAS No., storage conditions and expiration date of positive controls will be documented in the report.

If necessary, other appropriate positive controls can be used with the approval of the Sponsor.

15.2 Solvent Controls

The solvents used for dissolving the test article and positive controls will be used as the solvent controls. Culture medium, deionized, distilled water, DMSO (CAS #67-68-5), ethanol (CAS #64-17-5), and acetone (CAS #67-64-1) are some of the solvents which are compatible with this test system. If there is a need to use other solvents, the approval of the Sponsor will be obtained prior to their use.

The source, lot number and storage conditions of solvent controls will be documented in the report. .

16.0 DOCUMENTATION

Detailed documentation of the procedures, results, and methods used for the analysis of the results of this study will be entered in a study notebook. The study notebook also includes copies of the protocol, protocol amendments and deviations, study reports, and all relevant communications with the Sponsor.

17.0 EXPERIMENTAL PROCEDURE

17.1 <u>Determination of Solubility/Miscibility</u>

In order to determine the appropriate vehicle for delivering the test article to the test system, or to determine the maximum achievable concentration in the solvent requested by the Sponsor, a solubility/miscibility test will be performed.

The test article will be tested for its solubility/miscibility in deionized, distilled water, DMSO, acetone, ethanol and/or other appropriate solvents. Solid and viscous liquid test articles will be tested for solubility in weight per volume, and nonviscous liquids will be tested for miscibility in volume or weight per volume. The solubility/miscibility test will be performed as described below.

For solid and viscous liquid test articles, the solubility test will consist of weighing out 25-100 mg aliquots of test article and adding solvent in 0.1 mL increments, with thorough mixing between additions, until the test article is dissolved or until 1.5 mL of solvent has been added to the vessel.

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If the test article does not dissolve in 1.5 mL of solvent, more solvent will be added in aliquots of 0.5 mL until 5.0 mL has been added. The volume of solvent required for complete dissolution, and any additional observations, will be recorded in the study workbook. Test articles that do not dissolve in 5.0 mL of solvent will be recorded as either "not soluble," "partially soluble forming a homogeneous suspension," or "partially soluble not forming a homogeneous suspension."

For nonviscous liquid test articles, a miscibility test will be conducted. 0.5 mL of each of the preferred solvents in 0.1 mL increments will be added to 0.5 mL aliquots of the test article. If the test article does not dissolve in 1.5 mL of solvent, more solvent will be added in 0.5 mL increments until 5.0 mL has been added. The resulting solution will be thoroughly mixed and observed for miscibility. The test article will be rated as either "not miscible," "partially miscible," or "completely miscible" in each of the preferred solvents. The miscibility rating and any additional observations will be recorded in the study workbook.

The solubility/miscibility test need not be performed if adequate information regarding the solvent and maximum soluble concentration is available.

The solubility or miscibility of the test article in culture medium will also be checked to determine the appropriate concentrations for the tests.

17.2 Preparation of Test Cultures

The CHO stock cultures grown in antibiotic-free medium and showing approximately 50-70% confluency will be harvested and used to prepare the test cultures for the Assay. The culture medium from the flasks will be discarded, and the cells will be washed with phosphate buffered saline (PBS). The cells will then be discociated by trypsin at $37 \pm 1.0^{\circ}$ C, and resuspended in fresh complete culture medium. An aliquot of the cell suspension will be diluted to the appropriate concentration and counted using a cell counter. Based on the cell counts, a separate cell suspension in complete culture medium with 1×10^{5} cells/mL will be prepared to seed the test flasks. An appropriate number of T-25 cm² tissue culture flasks will be seeded with 5.0 mL of cell suspension to obtain test cultures with 5×10^{5} cells/flask. The cultures to be maintained beyond 48 hours after their initiation, will be seeded with an appropriately reduced number of cells (250,000-400,000 cells per flask) in order to avoid overgrowth of the monolayer. In the case of test articles, which react with plastic, 60 mL sterile glass culture flasks will be used instead of T-25 cm² plastic culture flasks. The flasks will be incubated for approximately 20-24 hours before treatment.

17.3 Preparation of Metabolic Activation System

The metabolic activation mixture will consist of phenobarbital/β-naphthoflavone induced rat liver homogenate (S-9 fraction) (8) and the cofactor pool. The S-9 fraction will be stored at or below -70°C in small aliquots. The S-9 will be validated for acceptable levels of protein content and metabolic activity. Immediately-prior to use, the S-9 will be thawed at room temperature and mixed with the cofactor pool to form the metabolic activation mixture which will consist of 4mM NADP, 5mM glucose-6-phosphate, 30mM KCl, 10mM MgCl₂, 50mM sodium phosphate (pH 7.4) and 100 μL/mL of S-9 fraction. This mixture will be diluted 1:4 by volume with serum-free medium and used in refeeding the cultures.

17.4 Preparation of Test Article

The desired amount of the test article will be weighed or measured as specified in the dilution

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scheme which will be prepared prior to treatment for either the Range Finding Test or Assay. The stock solution of the highest concentration will be prepared by adding the appropriate volume of solvent to the test article just prior to use and thoroughly mixing the resulting solution until the desired dissolution is achieved. The remaining stock solutions specified in the dilution scheme will be prepared by a subsequent dilution or by dissolving the required amount of test article in the solvent at each concentration. When preparing the top dosing stock and any sub-sequent dosing stock with a viscous or non-viscous liquid, the test article should never be diluted more than 10-fold. In all treatments, the amount of solvent delivered to the target cultures will be limited to a level, which has no significant cytotoxic effect on the cells. If necessary, the test article may be added directly to the culture medium. If the test article is found to alter the pH of the culture medium to an extent that is toxic to the cells (9), either HEPES buffered medium will be used during treatment time or necessary adjustments will be made to the stock solution(s) or treatment medium prior to chemical exposure. A record of the pH measurements will be maintained in such cases.

17.5 Range Finding Test

If sufficient information is not available regarding the toxicity of the test article, a Range Finding Test will be performed in order to determine the test article concentrations that will produce 0-100% cytotoxicity. The test article will be weighed and a serial dilution will be prepared. If there is no solubility limitation, prior knowledge of cytotoxicity indicates differently, or the Sponsor specifies differently, the test article will be tested at eight to ten concentrations at a maximum concentration of 5000 μ g/mL and lower concentrations covering four log dilutions. A solvent control will also be included in both the non-activated and activated systems. An untreated control (exposed only to water) will be included if a solvent other than water or culture medium is used. If a narrower concentration range or lower concentrations are required to determine the desired cytotoxic range, the Range Finding Test will be repeated.

The test cultures seeded approximately 20-24 hours earlier and are in the log phase will be used in the Range Finding Test. Duplicate cultures will be used at each concentration level.

In the non-activated system, the culture medium will be removed, and 5.0 mL of fresh complete medium will be added to each of the culture flasks. The cells will then be exposed to the test article for 3 hours. After the exposure period, the cells will be washed with DPBS, refed with complete medium, allowed to grow for 15 hours with 0.1 μ g/mL Colcemid® present during the final 2 hours, and harvested 18 hours after the initiation of the treatment (1.5 x normal cell cycle time).

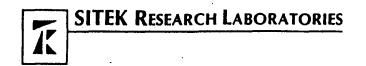
In the activated system, the medium will be removed and 5.0 mL of serum-free medium containing S-9 will be added to each of the culture flasks prior to treatment. The cells will be exposed to the test article for 3 hours by adding appropriate volumes of test article or dosing solutions to the culture medium. After the exposure period, the cells will be washed with DPBS, refed with complete culture medium, allowed to grow for 15 hours with 0.1 µg/mL Colcemid[®] present during the final 2 hours, and harvested 18 hours after the initiation of the treatment (1.5 x normal cell cycle time).

17.5.1 Determination of Relative Cell Growth (RCG) (2, 3)

After the Colcemid exposure, the medium with dividing cells in each flask will be transferred into labeled centrifuge tubes, the monolayer of cells will be washed with PBS, dissociated with 0.05% trypsin and resuspended in the collected medium. An aliquot of this cell suspension will be counted using an electronic cell counter. The number of cells per flask will be calculated for each

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concentration, and the Relative Cell Growth (RCG) will be calculated according to the following formula:

RCG = No. Cells in Test Flask X 100 No. Cells in Solvent Flask

17.5.2 Determination of Relative Mitotic Index (RMI)

The remaining cell suspension will be processed to determine the Relative Mitotic Index (RMI) as described below:

The cells will be collected by centrifugation, swelled in hypotonic KCl (0.075M), and fixed in methanol:glacial acetic acid (3:1) fixative. The fixed cells will be kept at 1-5°C. The cells will then be collected by centrifugation, resuspended in a small volume of fresh fixative, and dropped onto microslides to prepare chromosome spreads. The slides will be air dried, stained in Giemsa stain, and mounted in Cytoseal using #1 cover glasses.

The slides will be scored for Mitotic Index (MI). A total of 1000 cells will be scored from each concentration (500 from each duplicate flask) and the number of dividing cells recorded. The MI for each concentration level will be calculated using the following formula:

MI = No. of Dividing Cells from 1000 Cells
10

The RMI will be calculated as shown below:

RMI = <u>Test Concentration MI</u> X 100 Solvent Control MI

The cytotoxicity will be evaluated on the basis of the RCG and/or RMI. If possible, a concentration causing approximately 50% reduction in RCG and/or RMI will be selected as the highest test concentration for the Chromosome Aberration Assay. In addition, three or more lower concentrations will be included in the Assay. If no cytotoxicity is observed at the maximum concentration tested, the Chromosome Aberration Assay will be performed at four decreasing concentrations starting with the maximum soluble concentration or one or two concentrations with precipitate. The actual concentrations for the assay, once determined, will be added to the protocol in the form of an amendment.

17.6 Chromosome Aberration Assay

The Chromosome Aberration Assay will be performed with a single harvest at 1.5 x normal cell cycle time.

Parallel Toxicity will be determined by the RCG of treated cells in comparison with solvent control. The procedure is the same as in the Range Finding Test.

The test cultures will be prepared as described in Section 17.2. Duplicate cultures will be treated and used at each concentration in each system in the evaluation of induced chromosome aberrations, RCG and RMI.

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The treatment procedures for the Chromosome Aberration Assay will be the same as in the Range Finding Test. The cells will be treated with four or more concentrations of the test article, two concentrations each of the two positive controls and the solvent control in both the activated and non-activated systems. Untreated controls (only exposed to water) will be included in the Assay if a solvent other than water or culture medium is used.

In the non-activated system, the cells will be treated in complete medium for three hours. After the exposure period, the medium will be removed, the cells will be washed with DPBS, refed with complete medium and incubated for 15 hours with 0.1 µg/mL Colcemid® present during the last 2 hours. The cells will be harvested 18 hours after the initiation of treatment (1.5 x normal cell cycle time).

In the activated system, the cells will be treated in serum-free, S-9 containing medium for 3 hours. The removal procedure and incubation and harvest times are the same as in the non-activated system described previously.

After the Colcemid exposure, the cell suspension will be processed to determine the RCG and RMI as described in the Range Finding Test, section 17.5.1 and 17.5.2.

The same slides will be used to score chromosome aberrations, and scored "blind" in order to avoid bias on the part of the scorer(s). A total of three test concentrations, if possible, the highest of which causes approximately 50% reduction in RCG and/or RMI, one positive control concentration, the solvent and untreated controls will be scored from the activated and non-activated systems. Whenever possible, 100 metaphases will be scored from each of the two duplicate flasks. Consequently, 200 metaphases will be scored for each concentration for chromosome aberrations. Only cells with 19-23 chromosomes will be scored, and the microscope coordinates of each cell with findings will be recorded. In addition, the number of endoreduplicated and polyploid cells in a total of 100 metaphases per culture will be scored and recorded.

The types of Chromosome Aberrations scored and the corresponding abbreviations used are given below (10, 11):

1. Chromatid-type Aberrations

Simple:		·
tg	-	Chromatid gap - an achromatic region occurring along the length of a chromatid in which there is no misalignment.
tb	-	Chromatid break - a discontinuity occurring along the length of either of the two chromatids, in which there is a misalignment.
isb		Isochromatid break - a discontinuity occurring in both the chromatids at the same locus showing complete rejoining or sister chromatid union at both the broken ends or incomplete rejoining, i.e., only at one of the two broken ends.
	•	
qr	<u>-</u>	Quadriradial - chromatid interchanges between chromosomes leading to four-armed configurations. This could be asymmetrical with formation of

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		·
·		a dicentric and an acentric chromatid, if union is complete, or symmetrical where there is no formation of a dicentric and an acentric chromatid.
tr	-	Triradial - isochromatid-chromatid exchanges resulting in three-armed configurations and sometimes fragments. The latter should not be scored as an independent aberration. The triradial could be monocentric or dicentric.
id	•	Interstitial deletion - intra-arm intrachanges resulting in deletion of small fragments which, however, stay in association with the parent chromatid.
ci	-	Chromatid intrachange - exchanges occurring between arms of the same chromosome resulting in asymmetrical (rings) or symmetrical configurations.
cr	-	Complex interchanges - multiarmed configurations resulting from breakage and reunion of two or more chromosomes.
2. Chromoso	me-type /	Aberrations
<u>Simple</u> :		
sg	:	Chromosome gap - an achromatic region occurring in both chromatids of the chromosome at the same locus with no misalignment.
źp	•	Chromosome break - a discontinuity at the same locus in both chromatids, giving one acentric fragment which may be misaligned and a shortened monocentric chromosome, and where there is no sister chromatid union.
Comple	<u>x</u> :	
d	-	Dicentric - an asymmetrical exchange between two chromosomes resulting in a chromosome with two centromeres with or without an accompanying acentric fragment which should not be scored as a second aberration.
r	-	Ring - inter-arm intrachange happening within the chromosome, leading to formation of a centric ring with or without a chromosome fragment. The fragment should not be scored as a second aberration.
dm	-	Double minutes - intra-arm intrachanges leading to tight acentric paired rings.
3. Other Aber	rrations	
pu	-	Pulverized chromosome or chromosomes - shattering of chromatid material resulting in several minute pieces. The identity of the chromosome is not decipherable. Considered as a single aberration.
sd	-	Severely damaged cell - cell with ten or more aberrations.

pp - Polyploid cells - metaphases with multiples or approximate multiples of the haploid set of chromosomes. Not scored for structural aberrations.

e - Endoreduplicated cells - metaphases with paired duplicated chromosomes or diplochromosomes. They are not scored for structural aberrations.

The chromosome aberration data from the score sheets will be consolidated on a Summary Table. The number of aberrations per cell and the percentage of cells with one or more aberrations will be calculated separately for each duplicate culture and then pooled for each concentration. Chromatid gaps and chromosome gaps will not be included in calculating the percentage of cells with aberrations and the number of aberrations per cell. Of the remaining aberrations, each aberration scored will be counted as one, except a severely damaged cell (sd) which will be considered equal to ten aberrations in calculating the number of aberrations per cell. Endoreduplicated and polyploid cells will be recorded separately in percentages.

17.7 Statistical Analysis

The data for the percentage of cells with aberrations for each concentration will be compared to the solvent control values using a Chi-square test. The results will be considered significant if $p \le 0.05$.

If the solvent control value is 0%, the data will be analyzed using the historical solvent control values. Statistical analysis will not be performed if the test concentration value is equal to or less than the concurrent or historical solvent control.

If a positive response is indicated by the Chi-square test, the Cochran-Armitage test (trend test) will be performed for evidence of a dose-related response (12). The trend test will be considered positive if $p \le 0.05$.

17.8 Confirmatory Chromosome Aberration Assay

A confirmatory assay will not be performed if the definitive assay is positive either with and/or without activation.

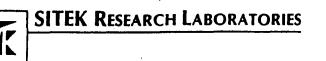
A confirmatory Chromosome Aberration Assay without activation will be performed if the results of the definitive assay without activation produced a negative response. A continuous treatment up to the harvest time of $1.5 \times 1.5 \times 1.5$

The harvest, RCG and RMI determination, and chromosome aberration scoring procedures will be the same as in the definitive assay. Parameters, such as test concentrations, may be adjusted in the confirmatory assay.

A confirmatory chromosome aberration assay with and without activation will be performed, if the definitive assay produces an equivocal response.

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17.9 Criteria for a Valid Assay

- 1. In the solvent control, the percentage of cells with aberrations should not exceed 4%.
- 2. At least 25% of the cells scored in the positive control should show one or more chromosome aberrations.
- 3. At least one of the test concentrations scored should show approximately 50% reduction in the RCG and/or RMI. This requirement should not be applied to test articles where no apparent toxicity could be achieved at the maximum soluble concentration or highest allowable concentration.

17.10 Evaluation of Test Results

17.10.1 Positive Response

- 1. The test article will be considered to have caused a positive response in this assay if the test article shows a positive dose-response trend and a statistically significant increase ($p \le 0.05$) over that of the solvent controls in the percentage of cells with aberrations at one or more concentrations.
- 2. In the event there is no positive dose response trend, at least two consecutive test concentrations show a statistically significant increase ($p \le 0.05$) over that of the solvent controls in the percentage of cells with aberrations.

17.10.2 Negative Response

The test article will be considered to have caused a negative response if none of the test concentrations shows a statistically significant increase in the percentage of cells with aberrations.

17.10.3 Equivocal Response

The test article will be considered to have caused an equivocal response if one of the test concentrations shows a statistically significant increase in the percentage of cells with aberrations without an accompanying positive dose-response trend.

17.10.4 Other Considerations

The above criteria will be used as guidelines in evaluating the test results. However, the Study Director may take other factors into consideration in evaluating the test results.

18.0 PROTOCOL AMENDMENTS AND DEVIATIONS

If changes in the approved protocol are necessary, such changes will be documented in the form of protocol amendments and protocol deviations. Protocol amendments will be generated when changes in the protocol are made prior to performing a study or part of a study affected by the changes. In such cases, a verbal agreement to make such changes will be made between the Study Director and the Sponsor. These changes and the reasons for them will be documented and attached to the protocol as an addendum. Protocol deviations will be generated when the procedures used to perform the study do not conform to the approved protocol. The Sponsor will

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be informed of these deviations, and as soon as practical, such changes, along with their reasons or explanations, will be documented and kept in the study notebook.

19.0 REPORT OF RESULTS

19.1 Content

The results of the study will be submitted to the Sponsor in the form of a final report. A draft report will be submitted before the final report is issued. The final report will be initiated sixty days after remittance of the draft report and issued no later than thirty days thereafter. The report will include, but not be limited to, the following:

- 1. Name and address of the testing facility and the dates on which the study was initiated and completed, terminated or discontinued.
- 2. Objectives and procedures stated in the approved protocol, including any changes in the original protocol.
 - 3. Methods used to analyze the data.
 - 4. The test and control substances.
 - 5. Description of the methods used to perform the study.
- 6. The name of the Study Director and the names of other technical personnel or other professionals who participated in performing the study.
- 7. A description of the transformations, calculations or operations performed on the data, a summary and analysis of the data, and a statement of the conclusions drawn from the analysis.
- 8. The signed and dated reports of the Study Director or other professionals involved in the study.
 - 9. The location where the raw data and reports are to be stored.
 - 10. A statement from the Quality Assurance Unit.
 - 19.2 Changes and Corrections to the Final Report

All changes to the final report will be in the form of report amendments which will include the reason(s) for the change, and these amendments will be added to the final report as an addendum.

20.0 ARCHIVES

The raw data, protocol, documentation, electronic file containing the data tables, and final report of the study will be maintained in the SITEK Research Laboratories Archives, 15235 Shady Grove Road, Suite 303, Rockville, Maryland 20850.

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21.0 REFERENCES

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PROTOCOL AMENDMENT

Amendment No.:	1
Amenament ivo	1

Sponsor: USA RDECOM, AMSRD-MSF

Environmental Acquisition & Logistics Sustaining

Program

Aberdeen Proving Ground, MD 21010

Testing Facility: SITEK Research Laboratories

15235 Shady Grove Road, Suite 303

Rockville, Maryland 20850

SITEK's Study No.: 1003-3110

Sponsor's Study No: N/A

Test Article ID: Ethylenediamine dinitrate (EDDN)

Protocol Title: Test for Chemical Induction of Chromosome Aberrations

in Cultured Chinese Hamster Ovary (CHO) Cells with

and without Metabolic Activation

Amendment No. 1: Protocol page 12, Section 17.5.2: The actual

concentrations for the Definitive Assay were 500, 1000, 2000, 3000, 4000 and 5000 μ g/mL both without and with activation. The actual concentrations for the Confirmatory Assay were 500, 1000, 2000, 3000, 4000

and 5000 µg/mL without activation.

Reason for Amendment No. 1: Protocol page 12, Section 17.5.2: The actual

concentrations for the assay, once determined, will be

added to the protocol in the form of an amendment.

APPROVED:

Jian Song, Ph.D.

Study Director

9-28-09 Date

PROTOCOL AMENDMENT

Amendment No.:	2
Sponsor:	USA RDECOM, AMSRD-MSF Environmental Acquisition & Logistics Sustaining Program Aberdeen Proving Ground, MD 21010
Testing Facility:	SITEK Research Laboratories 15235 Shady Grove Road, Suite 303 Rockville, Maryland 20850
SITEK's Study No.:	1003-3110
Sponsor's Study No.:	N/A
Test Article ID:	Ethylenediamine dinitrate (EDDN)
Protocol Title:	Test for Chemical Induction of Chromosome Aberrations in Cultured Chinese Hamster Ovary (CHO) Cells with and without Metabolic Activation
Amendment No. 2: Protocol Page been replaced by Paul E. Kirby, Ph.I	1, Section 2.3, Study Director, Jian Song, Ph.D. has D. as Study Director.
Reason for Amendment No. 2: Jia Research Laboratories.	n Song, Ph.D. is no longer in the employ of SITEK
APPROVED:	·
Paul E. Kirby, Ph.D. Study Director	2-22-10 Date

APPENDIX IV

S-9 BATCH INFORMATION



CERTIFICATE OF ANALYSIS

Product Name:

Rat liver Postmitochondrial Supernatant (S-9)

Product Number:

74002

Lot Number:

1102-2001

Product Brand:

APSciences, Inc.

Storage Temperature:

-80°C

Strain	Sprague Dawley		
Species	Rat		
Tissue Type	Liver		
Appearance	Reddish brown liquid in 2mL vial		
Expiration Date	2 Years	June 19, 2011	
Protein Concentration	38.5 mg/mL in 0.15 KCl		
Preparation	Inducing agents: Phenobarbital (75 mg/kg body weight); b- naphthoflavone (80 mg/kg body weight); intraperitoneal injection once per day from days 1 to 4 (phenobarbital), and from day 3 to day 4 (b- naphthoflavone). Organs harvested for S9 preparation on day 5.		
BioAssays	Lymphocytes: Induct observed with cyclop control). 2. Salmonella typhimuriu Induction of revertant TA98 (50 x backgroun background); TA1537	tion Assay in Human Peripheral Blood tion of cells with chromosomal aberrations chosphamide (no aberrant cells in solvent um and E. Coli WP2 uvrA Mutation Assays: ts by 2-aminoanthracene (2.5 ug/plate) in td); TA100 (8 x background); TA1535 (11 x (9 x background); and 2-20 ug/plate) in WP2 uvrA (6 x	

Signature:	miles -		
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Printed Name: $_$	Nola Mahaney		
lītle:	VP, Operations		
Date (Revision 1):	FEB/25/2010		